

PATENT  
C4-971A (23336-20)RECEIVED  
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**Remarks**

Claims 28-54 are pending in this application. Claims 28-54 are rejected. No new matter has been added. It is respectfully submitted that the pending claims define allowable subject matter.

Claims 28-30 and 40-45 have again been rejected under 35 U.S.C. § 102(e) as being anticipated by Randall (U.S. Patent 6,727,938). Applicants respectfully traverse the 35 U.S.C. § 102(e) rejection.

The Office asserts that independent claims 28, 40 and 43 are anticipated by Randall. The Office argues that Randall clearly discloses at least two different types of control zones. "The first being the 'tracking zone' which is monitored for movement and is selected by default (Randall col. 4 lines 26-58 note unless otherwise specified the entire field of view is monitored). The second being the blocking, or black-out, zone (Randall fig. 2B and col. 4 line 59 to col. 5 line 17). A user can then select a region to use one control zone type or the other by creating or modifying a mask for the particular view (Randall Col. 7 lines 4 to 49)." (See Office Action, pages 6-7). The Office then concludes that because the images of Randall "can be subject to at least two separate types of processing based on defined zones the examiner believes that Randall discloses selectable control zone type." (Office Action, page 7).

Applicants respectfully submit that the arguments asserted by the Office are not sufficient to support the rejection of the claims. Applicants respectfully submit that if the tracking zone is selected by default then this is not a selection. The Office asserts that the entire field of view is monitored and selected by default to define the tracking zone. However, Randall does not describe or suggest allowing a user to select regions other than the default selection of the entire field as the tracking zone as argued by the Office. A selection by default is no selection at all, particularly when the user is not allowed to select a different tracking zone other than the entire field of view. Accordingly, the rationale that a tracking zone is selected is not supported by the disclosure of Randall.

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Independent claims 28 and 43 each recite “receiving indication of a tracking zone within the field of view.” As defined in the Office Action, the field of view is the tracking zone and is the same area. Accordingly, it is not possible to receive an indication of a tracking zone *within* the field of view.

Moreover, using the rationale of the Office, the field of view defines the tracking zone and then a blocking or black-out zone may be selected within the field of view that is being monitored. Accordingly, one or more zones are defined within a viewing area, namely the field of view. Thus, two distinct areas are provided (i.e., the blocking or black-out zone within the entire field of view that defines the tracking zone). In contrast, claims 28 and 43 add a further distinct area such that three distinct areas are provided. Specifically, independent claims 28 and 43 each recite “displaying motion video data representative of the field of view of the motion video camera”, “receiving indication of a tracking zone within the field of view” and “receiving indication of a selected region within the tracking zone having a selectable control zone type.” Accordingly, the first area is the field of view that displays the view of the motion video camera, the second area is the tracking zone indicated *within* the field of view and the third area is the selected region indicated *within* the tracking zone and having a selectable control zone type. As admitted by the Office, Randall only includes two distinct areas, the tracking zone defined by the field of view and the blocking or black-out zone *within* the tracking zone. The Randall reference also supports this description of a security system with only two distinct areas. This is not the same as the three distinct areas that are recited in claims 28 and 43 wherein a tracking zone is indicated *within* a field of view and a selected region is indicated *within* the tracking zone. This additional level of monitoring control is simply not described or suggested in Randall. Thus, Randall does not describe or suggest a method as recited in claim 28 and a computer readable medium as recited in claim 43.

Independent claim 40 recites a system for defining control zones of different types in a field of view of a motion video camera comprising “means for defining a plurality of control zones in a selected area of the field of view of the motion video camera, said control zones being of a type selected from said plurality of control zone types in said

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database and defining a tracking behavior for the control zone.” Randall also fails to describe or suggest such a system.

As described above with respect to claims 28 and 43, although within the field of view masked regions may be defined where processing, namely monitoring, is blocked, and regions within the field of view outside the masked regions where monitoring is performed, there is simply no description or suggestion of defining different types of regions within *selected areas* of the field of view. The selected areas within the field of view (i.e., the areas within the tracking zone as defined in the Office Action) are *only* masked regions that block the monitoring. The type for these selected regions cannot be changed. In contrast, as recited in claim 40, the plurality of control zones within the selected area of the field of view may be *selected* from a *plurality* of control zone types. Randall provides only one control zone type within the field of view, namely the blocking/black-out zone. Thus, Randall does not describe or suggest a system as recited in claim 40.

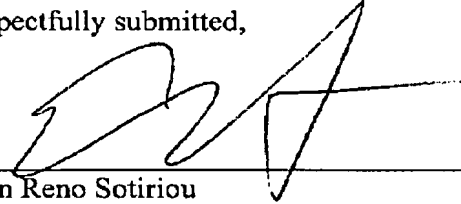
Dependent claims 31-39 and 46-54 have again been rejected under 35 U.S.C. § 103(a) as being unpatentable over Randall in view of Kageyama (U.S. Patent 5,552,823). Applicants respectfully traverse the 35 U.S.C. § 103(a) rejection.

Claims 31-39 depend from independent claim 28 and claims 46-54 depend from independent claim 43. Even from a cursory reading of Kageyama, this reference fails to make up for the deficiencies in the Randall reference. Thus, when the recitations of claims 31-39 and 46-54 are considered in combination with the recitations of claims 28 and 43, respectively, Applicants submit that dependent claims 31-39 and 46-54 are likewise patentable over Randall for at least the same reasons set forth above.

In view of the foregoing remarks, it is respectfully submitted that the prior art fails to teach or suggest the claimed invention and all of the pending claims in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited. Should anything remain in order to place the present application in condition for allowance, the Examiner is kindly invited to contact the undersigned at the telephone number listed below.

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Respectfully submitted,



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